

DEPARTMENT OF PLANNING  
STAFF REPORT

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**PLANNING COMMISSION PUBLIC HEARING**

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**DATE OF HEARING: October 15, 2007**

**CMPT-2007-0012 & ZMOD-2007-0010, Verizon at Round Hill**

**DECISION DEADLINE: extended to November 4, 2007**

**ELECTION DISTRICT: Blue Ridge**

**PROJECT PLANNER: Judi Birkitt**

**EXECUTIVE SUMMARY**

Verizon Wireless of Annapolis Junction, Maryland, has submitted an application for Commission approval to permit the installation of a telecommunication facility consisting of an 8-foot vertical mast with twelve (12) telecommunication panel antennas to be located on the apex of an existing 145-foot water tank, and an associated ground-mounted equipment shelter at the base of the water tank in the PD-H3 (Planned Development-Housing 3) zoning district. Pursuant to Article 700.2 of the Ordinance, the Applicant is also requesting a modification of Article 520.4.1 to permit the height of the existing non-conforming water tank to exceed its setback from the property lines by a distance that is equal to the height of the telecommunication mast, antennas, and related mounting devices. This application is subject to the 1972 Zoning Ordinance and requires Commission Permit approval in accordance with Article 905. The subject property is approximately 0.93 acres and is located east of the Round Hill Elementary School on the east side of Evening Star Drive, approximately one half mile north of Harry Byrd Highway (Route 7) at 17144 Evening Star Drive, Round Hill, Virginia in the Blue Ridge Election District. The area is governed by the policies of the Revised General Plan and the Strategic Land Use Plan for Telecommunications Facilities, which designate this area for rural residential uses at 1 dwelling unit per twenty acres.

The Board of Supervisors will consider a companion Special Exception, SPEX-2007-0019, at a future public hearing. In accordance with Section 701.6.4.1 of the 1972 Zoning Ordinance, the Board of Supervisors may permit a telecommunication facility in PD-H: Planned Development - Housing Districts by special exception, and the procedure is for the Applicant to file an application directly with the Board of Supervisors for consideration, without a recommendation from the Planning Commission.

**RECOMMENDATION**

Staff finds that the application is in general conformance with the policies outlined in the Revised General Plan and the Strategic Land Use Plan for Telecommunications Facilities. Staff supports approval of the Commission Permit to construct a telecommunication facility. Staff also supports

approval of the Zoning Modification of Section 520.4.1 to permit the height of the existing water tank to exceed its setback from all property lines subject to the findings and conditions of approval contained in this report.

## SUGGESTED MOTIONS

1. I move that the Planning Commission approve CMPT-2007-0012, Verizon at Round Hill, and forward it to the Board of Supervisors for ratification based on the Findings contained in the October 15, 2007 Staff Report and with the Plat dated August 15, 2006, revised through September 5, 2007 prepared by Glock Smidt Engineering, Inc.

And,

2. I move that the Planning Commission forward ZMOD-2007-0010, Verizon at Round Hill, to the Board of Supervisors with a recommendation of approval subject to the Condition of Approval and based on the Findings contained in the October 15, 2007 Staff Report.

## VICINITY MAP



**Directions:** From Leesburg, proceed west on Harry Byrd Highway (Route 7). Exit onto Loudoun Street. Turn right (north) onto Evening Star Drive and proceed approximately 0.65 miles. The site is on the right, accessed from a gravel drive.



## TABLE OF CONTENTS

I.	Application Information .....	4
II.	Referral Agency Comment Summary .....	5
III.	Findings .....	6
IV.	Conditions of Approval .....	6
V.	Project Review .....	7
A.	Context .....	7
B.	Summary of Outstanding Issues .....	9
C.	Overall Analysis .....	9
VI.	Attachments .....	15



*Staff Photo - Existing 145' Round Hill Water Tank*

## I. APPLICATION INFORMATION

APPLICANT	Verizon Wireless Robert Posilkin 9000 Junction Drive Annapolis, Maryland 20701										
REPRESENTATIVE	Venable, LLP Frank Stearns 8010 Tanks Crescent Drive Suite 300 Vienna, VA 22182 (703) 760-1956										
APPLICANT'S REQUEST	(1) Commission approval to permit an 8-foot vertical mast with 12 telecommunication panel antennas on the apex of an existing 145-foot water tank plus associated ground equipment and (2) Zoning Modification of Section 520.4.1 of the Ordinance to permit the height of the water tank to exceed its setback from all property lines a distance that is equal to the height of the telecommunication mast, antennas, and mounting devices										
LOCATION	17144 Evening Star Drive, Round Hill, VA North of the intersection of Evening Star Drive and Harry Byrd Highway (Route 7)										
TAX MAP/PARCEL #	/34//30///1-A/ Pin# 554-26-6077										
ZONING	PD-H3 (Planned Development-Housing 3) 1972 Zoning Ordinance										
ACREAGE OF SITE	0.93 acres										
SURROUNDING ZONING/ LAND USES											
	<table><tr><th>ZONING</th><th>PRESENT LAND USES</th></tr><tr><td>North</td><td>PD-H3/AR-1</td></tr><tr><td>South</td><td>PD-H3</td></tr><tr><td>East</td><td>PD-H3/AR-1</td></tr><tr><td>West</td><td>PD-H3</td></tr></table>	ZONING	PRESENT LAND USES	North	PD-H3/AR-1	South	PD-H3	East	PD-H3/AR-1	West	PD-H3
ZONING	PRESENT LAND USES										
North	PD-H3/AR-1										
South	PD-H3										
East	PD-H3/AR-1										
West	PD-H3										
ELECTION DISTRICT	Blue Ridge										

## II. SUMMARY OF DISCUSSION

REFERRAL AGENCY	ISSUES EXAMINED AND STATUS
Comprehensive Plan	<ul style="list-style-type: none"> <li>The <u>Telecommunications Plan</u> calls for designing and constructing telecommunications facilities to accommodate 3 collocators. – Resolved, the Applicant has submitted a structural study that provides physical justification for why a third collocator may not be feasible.</li> <li>The vertical mast and antennas will be painted to match the water tank. - Resolved.</li> <li>The Applicant will remove the telecommunication facility following the cessation of the use. – Resolved.</li> </ul>
Zoning	<ul style="list-style-type: none"> <li>A zoning modification is required per Article 520.4.1 of the Ordinance because adding the mast and antennas increases the height of the existing non-conforming water tank, thereby increasing its degree of nonconformity. – Resolved, applied for a ZMOD as part of this application.</li> <li>Provide a Type 4 Buffer around the perimeter of the facility. – Resolved.</li> <li>Plat corrections. – Resolved.</li> </ul>
Environmental	<ul style="list-style-type: none"> <li>No issues.</li> </ul>
Fire and Rescue	<ul style="list-style-type: none"> <li>No issues.</li> </ul>
Health	<ul style="list-style-type: none"> <li>No issues.</li> </ul>
Parks and Recreation	<ul style="list-style-type: none"> <li>No issues.</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>No issues.</li> </ul>
VDOT	<ul style="list-style-type: none"> <li>No issues.</li> </ul>
Town of Round Hill	<ul style="list-style-type: none"> <li>No issues. Supports Applicant's request. Although the Town is aware of potential structural issues, the Town does not want to limit the possible number of collocators on the water tank.</li> </ul>
Disclosure of Real Parties in Interest	<ul style="list-style-type: none"> <li>Submitted April 6, 2007 and complete.</li> </ul>

### III. FINDINGS

#### Commission Permit

1. The proposed project is in conformance with the location policies of the Revised General Plan and the Strategic Land Use Plan for Telecommunications Facilities, which identify a water tank as a preferred location and recommend that new commercial public telecommunication antennas be located on existing tall structures subject to performance standards to mitigate visual impacts.
2. The proposed project allows for two (2) telecommunication providers and is in general conformance with the collocation policies of the Strategic Land Use Plan for Telecommunications Facilities, which supports the collocation of three (3) total providers unless doing so would create an unnecessary visual impact on the surrounding area or there is a physical justification as to why collocation is not possible.
3. The proposed project is in substantial accordance with the character and extent policies of the Revised General Plan and the Strategic Land Use Plan for Telecommunications Facilities and will not create an unnecessary visual impact on nearby properties or Harry Byrd Highway (Route 7) provided that the telecommunication facility is constructed as proposed and the Type 4 Buffer is installed and maintained as proposed.
4. The proposed project will not impact any elements of the Green Infrastructure as outlined in the Revised General Plan.
5. The proposed project will not directly impact area roads and the surrounding transportation network.

#### Zoning Modification

- I. The proposed Zoning Modification, as conditioned, serves public purposes to a degree that is equivalent to the applicable general zoning regulations regarding height, setback, and non-conforming structures.
- II. The proposed Zoning Modification, as conditioned, is consistent with the applicable policies of the Revised General Plan.
- III. The application complies with the applicable requirements of the 1972 Zoning Ordinance.

### IV. CONDITION OF APPROVAL

#### Zoning Modification

1. The proposed telecommunication facility shall be developed in substantial conformance with the Plat, consisting of 1 sheet, dated August 15, 2006 and revised through September 5, 2007



prepared by Glock Smidt Engineering, Inc. and the Loudoun County Zoning Ordinance. Approval of this application does not relieve the Applicant of any Zoning Ordinance, Codified Ordinance, or any other regulatory requirement.

## V. PROJECT REVIEW

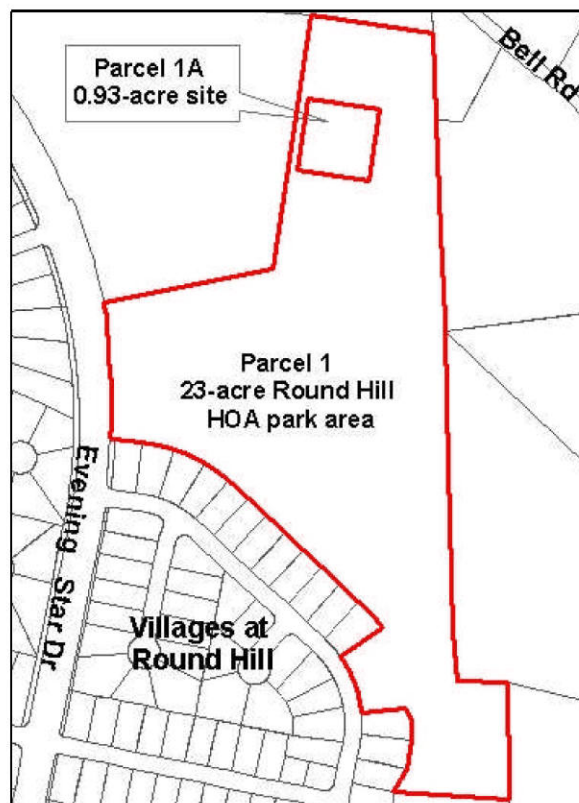
### A. CONTEXT

The Applicant requests Commission Permit approval to install an 8-foot vertical mast with twelve (12) telecommunication panel antennas on the apex of the existing 145-foot tall Round Hill water tank, increasing the overall height of the structure to approximately 153 feet. The request includes the construction of a 360 square foot (12' x 30' x 10') unmanned ground-mounted equipment shelter that will be sited on a concrete slab near the base of the water tank.

The subject site consists of a 0.93-acre parcel containing an existing 145-foot water tank and an existing associated ground-mounted structure at the base of the water tank. A buffer consisting of chain link fencing and a mix of evergreen and deciduous canopy trees, understory trees, and shrubs surrounds the existing municipal water storage facility.

Subdivision waiver SBWV-2004-0005 subdivided the subject site (Parcel 1A) from the 23.17-acre parent parcel (Parcel 1) that surrounds the subject site. The Round Hill Home Owners Association (HOA) owns the 23.17-acre parcel (Parcel 1), which serves as a park for the Villages at Round Hill, a single-family residential subdivision that is located south of the subject property, beyond the Round Hill HOA park area. The HOA conveyed the subject property to the Town of Round Hill for a municipal water storage system and granted the Town of Round Hill a 24-foot access easement from Evening Star Drive to the water tank. The proposed telecommunications facility will be accessed via an existing gravel drive that lies within this private access easement and outside of the Commission Permit area.

Round Hill Elementary School is located approximately 30 feet west of the subject site (measuring from property line to property line). The nearest two residences to the proposed telecommunications facility are located approximately 200 feet to the east and 230 feet to the northwest, both with frontage on Bell Road. Residences between the water tank and Bell Road are separated from the facility by the





Round Hill HOA park area, as well as a wooded area that consists primarily of mature deciduous trees and that is located largely outside of the Round Hill HOA park.



The Applicant has submitted a Statement of Justification, radio frequency (RF) coverage maps and photo simulations depicting the proposed mast and antennas on top of the water tank and has provided materials supporting its need and consistency with the County's telecommunications policies. The propagation maps illustrate that the proposed telecommunication facility will provide coverage for a portion of the Route 7 corridor and the surrounding community where gaps in service currently exist.

According to County records, the nearest existing telecommunication facility is Cellular One on the Purcellville Water Tank at 311 Maple Avenue, approximately four (4) miles east of the Round Hill Water Tank. At their October 15, 2007 public hearing, the Planning Commission will also consider Special Exception (SPEX-2007-0019) and Commission Permit (CMPT) applications for the nearest proposed telecommunication facility, CWS Site #114. Community Wireless Structures (CWS) of Falls Church, Virginia proposes to construct a 150-foot monopole to accommodate six (6) providers. The proposed site is located approximately 200 feet east of the Round Hill water tank at 36055 Bell Road (Route 720). The CWS monopole would supplement the telecommunication facility at the Round Hill water tank, and like the Applicant, proposes to use the same gravel access drive used by the Town of Round Hill to access the water tank.



**B. SUMMARY OF OUTSTANDING ISSUES**

There are no outstanding issues.

**C. OVERALL ANALYSIS**

**COMPREHENSIVE PLAN**

The subject site is located within the Rural Policy Area and falls outside of the Round Hill Joint Land Management Area (JLMA). The subject site is governed under the policies of the Revised General Plan, which designates the area for rural residential and rural economy uses with a base density of twenty (20) acres per lot, which may be increased up to one dwelling per five (5) acres when developed in a clustered pattern. The proposed use is specifically governed under the policies of the Strategic Land Use Plan for Telecommunications Facilities (Telecommunications Plan).

The purpose of a Commission Permit is to determine if the general location, character, and extent of the proposed use is in substantial accord with the Comprehensive Plan, pursuant to Article 905 of the 1972 Zoning Ordinance, which states that no public utility shall be constructed until the Planning Commission has approved the location, character, and extent as being substantially in accord with the Comprehensive Plan.

**LOCATION**

Telecommunications Plan policies establish a hierarchy of preferred locations for new commercial public telecommunication facilities. To minimize the need for new facilities, the County's first preference is on existing buildings, towers, monopoles, water tanks, overhead utility transmission line structures, and other similar existing tall structures over 50 feet in height (Telecommunications Plan, Policy 1, p. 3). The proposed site is a preferred location for telecommunication facilities. The telecommunication facility will effectively use the height of the existing structure to provide improved wireless coverage to the area without requiring the construction of a new tower or monopole.

The Applicant selected the existing 145-foot Round Hill water tank in order to eliminate an existing gap in wireless coverage along the Route 7 corridor. The Applicant conducted a search for other tall structures in the vicinity and determined that no other existing tall structures of sufficient height met network coverage requirements. The nearest existing telecommunication facility is Cellular One on the Purcellville Water Tank approximately four (4) miles east.

To limit the need for new monopoles, the Telecommunications Plan calls for telecommunications facilities to be constructed to accommodate at least three providers. The Applicant proposes to construct a vertical mount assembly on top of the water tank that will be strong enough to accommodate three (3) total providers. However, the Applicant's structural study indicates that logistical problems exist for a potential third provider. The Applicant proposes to install the vertical mast without welding or drilling into the water tank and without draining the water out of the water

tank. A second future provider can extend the height of the mast up to approximately 25 feet above the water tank and install its antenna panels directly above the Applicant's antenna panels, without welding, drilling or draining. However, a third provider would require welding or drilling into the water tank, draining the water out of the water tank, plus since the interior of the water tank can accommodate cables for only two providers, a third provider would need to locate its telecommunications cables along the outside of the water tank and may need to mount its antennas further out on the bell of the water tank, rather than on the apex of the tank.

The Telecommunications Plan takes into consideration fewer than three collocators under the following circumstances:

*"Tower and monopole sites should be designed and constructed to the minimum height necessary to accommodate at least three providers on the tower or monopole and provide sufficient land area for additional equipment buildings unless doing so would:*

- (a) Create an unnecessary visual impact on the surrounding area; or*
- (b) No additional need is anticipated for any other potential user in this area; or*
- (c) There is some valid economic, technological or physical justification as to why collocation is not possible." (Policy B.2, p.6).*

Staff finds that the application meets the intent of the Telecommunications Plan collocation policies because (1) The Applicant's structural study demonstrates valid physical justifications as to why a third provider should not collocate on the water tank and (2) A third provider would result in running cables along the outside of the water tank, and possibly mounting antennas further out on the bell of the water tank, which could create an unnecessary visual impact on the surrounding area.

## **DESIGN STANDARDS AND VISUAL IMPACT**

Telecommunications Plan policies outline design standards to mitigate the visual impacts of commercial public telecommunications facilities so as to blend with the natural and built environment of the surrounding area. The Telecommunications Plan directs that specific attention be paid to issues pertaining to setting, color, lighting, topography, materials, and architecture. Antennas and other telecommunication devices should be neutral in color to blend with the background, unless specifically required by the FAA to be painted or lighted otherwise (Telecommunications Plan, Policy 2, p. 6). A note on the Special Exception Plan states that the mount and antennas will be painted to match the existing water tank. A second note on the Plat indicates that the antenna structure will have no lights or signs unless required for aircraft warning. For clarification and consistency with the Telecommunications Plan, staff will add a recommended condition to the companion Special Exception that the telecommunication site on the apex of the water tank shall not include signage or lighting, unless specifically required by the FAA or directed by the County.

The Plan states that equipment shelters should also blend with the surrounding environment through the use of appropriate color, texture of materials, scale, landscaping and visual screening (Telecommunications Plan, Policy B 3, p. 7). The Applicant's Plat indicates that the

equipment shelter will be prefabricated with a “washed stone” (gravel) finish, approximately 360 square feet in size (30'L x 12'W x 10' 7"H), and located on a concrete slab near the base of the existing water tank.

A landscape buffer is currently in place around the perimeter of the site to screen views of the lower portion of the water tank and associated ground equipment. The existing buffer consists of a 6-foot tall chain link fence and a mix of evergreen and deciduous canopy trees, understory trees, and shrubs. The Applicant proposes to supplement the existing buffer with 24 evergreen trees and 8 understory trees and to replace the chain link fence with a green slatted fence to achieve 95 percent opacity. The presence of the Round Hill HOA park area and the existing wooded area to the east of the site, beyond the HOA park area will also help minimize the larger visual impact of the proposed facility on the surrounding area.

The Applicant has provided computer simulated color photographs depicting how the proposed antennas may appear on the existing water tank. These enhanced photographs are taken from various vantage points from the public right-of-way along Evening Star Drive. In the photo simulations, the antenna arrays are clearly visible on top of the exiting water tank. Based on a site visit to the area, staff anticipates that the antenna arrays will be similarly visible from Bell Road (Route 720), Harry Byrd Highway (Route 7), Colonial Highway (Route 7 Business), and the surrounding properties.

Based on a site visit and computer simulated color photographs, the visual impact created by the proposed mount assembly and antenna array on the top of the existing water tank is anticipated to be relatively insignificant compared to the larger existing visual impact created by the 145-foot water tank on the surrounding landscape. The proposed site is a preferred location for telecommunications facilities within the County. Staff finds that the proposed telecommunication facility is in general conformance with Telecommunications Plan design and visual impact policies.

## **SAFETY AND HEALTH**

Plan policies state “an applicant or its successors shall remove all unused structures and facilities from a commercial public telecommunications site, including tanks and monopoles, within 90 days of cessation of commercial public telecommunications use or the expiration of the lease, whichever occurs first, and the site should be restored as closely as possible to its original condition” (Telecommunications Plan, Policy C2, p. 10). Staff will add a recommended condition of approval to the companion Special Exception to ensure removal of the facility following cessation of use.

## **GREEN INFRASTRUCTURE**

The Revised General Plan places a priority on preserving Green Infrastructure. Green Infrastructure is a collection of natural, cultural, heritage, environmental, protected, passive and active resources that will be integrated in a related system. It includes stream corridors, vegetative landscapes, wildlife and endangered species habitats, and heritage resources



(Revised General Plan, Policy 1, p.5-1 & 5-2). Development should take place around these elements, incorporating them into the design of a site (Revised General Plan, text, p. 6-2). Such an approach places a priority on preserving both sensitive environmental and man-made features.

The installation of the proposed antenna array on the existing water tank, the location of the associated equipment shelters at the base of the water tank, and access of the equipment via the existing driveway will have no effect on animal habitat, vegetation, water quality or air quality and no impact on Green Infrastructure elements as outlined in the Revised General Plan.

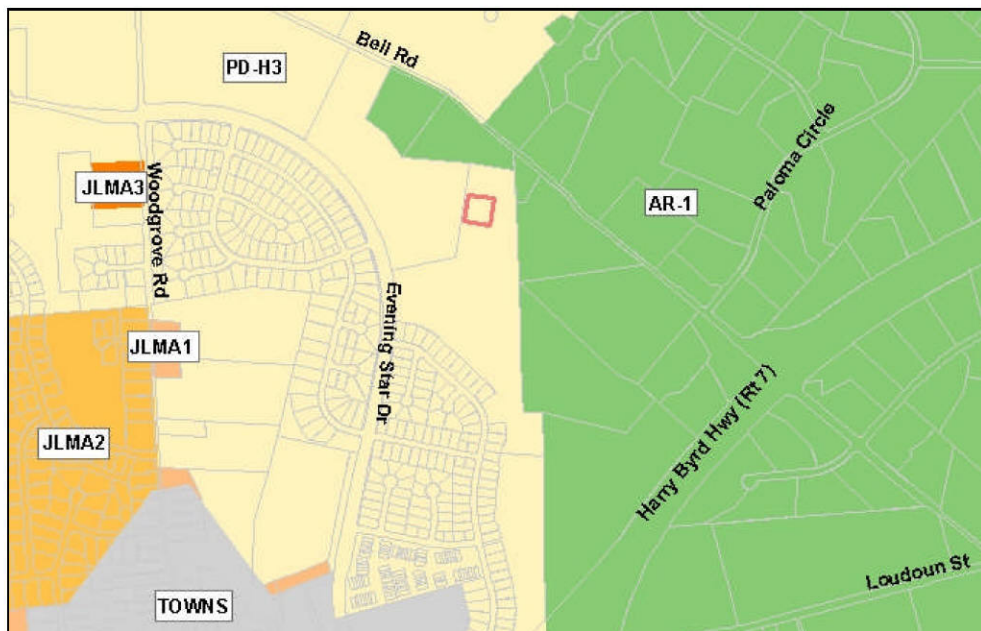
#### Community Meeting

As recommended by the Telecommunications Plan, the Applicant held a community meeting on September 6, 2007 at the Round Hill Elementary School, showing numerous simulated photographs to the approximately thirty (30) citizens in attendance. The majority of citizen comments and questions focused upon the need for more reliable service and how soon service would become available if the Board of Supervisors approves the application. Other citizens questioned the need for two telecommunications facilities to be located so close to one another, referring specifically to the CWS Site #114 that is proposed to be constructed approximately 200 feet east of subject facility.

### TRANSPORTATION

The proposed telecommunications use will have minimal impact to Evening Star Drive and Harry Byrd Highway (Route 7) since it is an unmanned facility and only requires periodic maintenance and inspections. The subject site will be accessed by a 24-foot wide gravel access drive off of Evening Star Drive. The access drive lies outside of the Commission Permit area within a private easement on the Round Hill HOA park area.

### ZONING



The subject property and surrounding adjacent properties are zoned PD-H3 (Planned Development - Housing 3). The subject property is governed by the 1972 Zoning Ordinance. As the 1972 Zoning Ordinance does not address telecommunications facilities specifically, staff has consistently interpreted the use as a public utility. Under Section 701.6.4.1, the Board of Supervisors may permit a public utility use in PD-H (Planned Development – Housing) districts by special exception, and the review process consists of the Applicant filing an application directly with the Board of Supervisors for consideration, without a recommendation from the Planning Commission. The Board of Supervisors will consider a companion Special Exception, SPEX-2007-0019, at a future public hearing.

#### Type 4 Buffer

Section 560.05(A) and Attachment B(4) of the Ordinance require a Type 4 buffer to be provided around the perimeter of the subject site. A Type 4 buffer consists of a 6-foot fence that provides a minimum of 95% opacity and the following landscaping:

- A 20-foot wide front yard buffer containing 4 canopy trees, 3 understory trees, and 20 shrubs per 100 linear feet;
- A 20-foot wide side yard buffer containing 2 canopy trees, 3 understory trees, 25 shrubs, and 5 evergreen trees per 100 linear feet; and
- A 30-foot rear yard buffer containing 4 canopy trees, 7 understory trees, 15 shrubs, and 10 evergreen trees per 100 linear feet.

A site visit and the Applicant's Plat indicate that canopy trees, understory trees, and shrubs already exist around the outside of the existing chain link fenced yard (216' x 216') that surrounds the subject site.



*Staff site photo – existing buffer*



To fully comply with the Type 4 Buffer requirement, the Applicant proposes the following as is indicated on the Plat:

- Replace the existing chain link fence with a green slatted fence that will provide 95% opacity, and
- Supplement the existing landscaping by planting 24 evergreen trees and 8 understory trees, which will extend the depth of the existing buffer yards to the required 20 and 30 feet.

Staff finds that the proposed landscaping and fencing comply with the Type 4 buffer requirements of the Ordinance.

#### Parking

Parking is to be provided for all public utilities as determined by the Planning Director per Article 701.10 of the Ordinance. A site visit and the Applicant's Plat demonstrate that existing parking is provided for the two required vehicles. Parking complies with the Ordinance.

#### Zoning Modification

In accordance with Section 700.2 of the Ordinance, the Applicant is requesting a zoning modification of Article 520.4.1 of the 1972 Ordinance, which requires structures such as water tanks to be set back from all property lines a distance that is equal to the height of the structure. Article 520.4. *Height Limitations*. 1. *Exceptions—excluded from application states:*

*The height limitations of this chapter shall not apply to barns, silos, farm building, residential chimneys, spires, flag poles, monuments or transmission towers and cables; nor to any smokestack, water tank, radio or television antenna or tower not exceeding in height the distance therefrom to the nearest lot line. . .*

The tank is 145 feet in height and, therefore, is required to be set back a minimum of 145 feet from all property lines. However, the water tank is currently a non-conforming structure. The County approved a subdivision waiver (SBWV 2004-0005) on May 27, 2005 that resulted in the water tank being less than the required 145 feet from all property lines (front setback: 113', rear: 22', sides: 61' and 66'). Creation of the smaller subject parcel (Parcel 1A) resulted in the water tank not complying with Article 520.4.1 of the Ordinance. Because the proposed addition of an antenna structure for Verizon would add an additional height of approximately 8 feet for a total of 153 feet, the proposed antennas would be increasing the height of the structure, thus increasing the degree of non-conformity, which is not allowed per Article 804.a. of the 1972 Ordinance, which states:

*No such non-conforming use and/or structure shall be enlarged or increased, nor extended to occupy a greater area of land than was occupied at the effective date of adoption or amendment of this ordinance unless said enlargement does not result in an increase in non-conformity or, results in a change to a use permitted in the district.*

The requested zoning modification would permit the height of the water tank, with the addition of the telecommunications devices, to exceed its setback from all property lines by an amount that is equal to the additional height that is being added by the installation of the telecommunications



devices, an additional approximately 8 feet.

Pursuant to Article 700.2 of the 1972 Zoning Ordinance, the Board of Supervisors may approve a Zoning Modification in a PD (Planned Development) district if they find, in the particular case:

- (1) That provisions herein do not serve public purposes to a degree at least equivalent to such general zoning, subdivision or other regulation or requirements, or*
- (2) That actions, designs or solutions proposed by the applicant, although not literally in accord with these special regulations or general regulations, satisfy public purposes at least an equivalent degree.*

Staff finds that the proposed Zoning Modification, as conditioned, serves public purposes to a degree that is equivalent to the applicable general zoning regulations regarding height, setback, and non-conforming structures. Staff supports the requested zoning modification.

<b>VII. ATTACHMENTS</b> (Unless noted otherwise, attachments are not available electronically but may be obtained from the Department of Planning)	<b>PAGE NUMBER</b>
<b>1. Review Agency Comments</b>	
a. Planning, Comprehensive Planning	A-1
b. Building and Development, Zoning Administration	A-6
c. Building and Development, Environmental Review Team	A-8
d. Planning, Transportation	A-9
e. Virginia Department of Transportation	A-10
f. Fire, Rescue, and Emergency Services	A-11
g. Health Services, Environmental	A-12
h. Parks and Recreation	A-13
i. Town of Round Hill	A-14
<b>2. Disclosure of Real Parties in Interest</b>	A-15
<b>3. Applicant's Statement of Justification</b>	A-22
<b>4. Applicant's Response to Referral Comments</b>	A-25
<b>5. Applicant's Structural Study</b>	A-27
<b>6. Photo Simulations &amp; Propagation Studies</b>	A-35
<b>7. Plat</b>	Attached